

# **Plaintiffs' Exhibit 169**

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

-----:  
UNITED STATES, et al., :  
:  
Plaintiff, :  
:  
vs. : Case No.:  
: 1:23-CV-00108-LMB-JFA  
GOOGLE, LLC, :  
:  
Defendant. :  
-----:

VIDEOTAPED DEPOSITION OF ALLEN OWENS, JR.


DATE: September 28, 2023  
TIME: 9:36 a.m.  
LOCATION: Paul, Weiss, Rifkind,  
Wharton & Garrison LLP  
2001 K Street, Northwest  
Washington, D.C. 20006-1047  
  
REPORTED BY: Shari R. Broussard, RPR, CSR  
Reporter, Notary  
  
Job No. CS6118347

<p style="text-align: right;">Page 46</p> <p>1 service that VMLY&amp;R shall do under this task</p> <p>2 order, correct?</p> <p>3 MR. PRITCHETT: Objection. Form.</p> <p>4 THE WITNESS: Correct. This lays out</p> <p>5 the -- the purchasing that is being requested.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q Okay. And this task order does not set</p> <p>8 a price for the advertising that Young &amp; Rubicam</p> <p>9 shall research, negotiate, and purchase, correct?</p> <p>10 MR. PRITCHETT: Objection. Form,</p> <p>11 foundation.</p> <p>12 THE WITNESS: That is correct.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q It simply sets a ceiling that they</p> <p>15 cannot exceed; is that correct?</p> <p>16 MR. PRITCHETT: Objection. Form,</p> <p>17 foundation.</p> <p>18 THE WITNESS: It does set the ceiling</p> <p>19 they cannot exceed and it does list the</p> <p>20 approximate number of impressions expected to get</p> <p>21 for that.</p> <p>22 BY MS. GOODMAN:</p>	<p style="text-align: right;">Page 48</p> <p>1 estimates in scope, number three here, correct?</p> <p>2 MR. PRITCHETT: Objection. Form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q And the Navy does not tell VMLY&amp;R how to</p> <p>6 purchase ads, correct?</p> <p>7 MR. PRITCHETT: Objection. Form,</p> <p>8 foundation.</p> <p>9 THE WITNESS: The Navy does not tell the</p> <p>10 contractor how to perform the job. As stated</p> <p>11 earlier, that -- that would be improper.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q And, therefore, you do not tell the</p> <p>14 contractor how to purchase the advertising</p> <p>15 requested that they go purchase in scope three?</p> <p>16 MR. PRITCHETT: Objection. Form,</p> <p>17 foundation.</p> <p>18 THE WITNESS: In scope three we lay out</p> <p>19 the items that we are looking to purchase and then</p> <p>20 based on a follow-on recommended plan is where we</p> <p>21 lay out the specifics of what we're looking to</p> <p>22 purchase. However, as you stated, we then do not</p>
<p style="text-align: right;">Page 47</p> <p>1 Q And that's an estimate, correct?</p> <p>2 A Due to the nature of the -- the -- the</p> <p>3 market price changes, then yes, that's an -- that</p> <p>4 is an estimate.</p> <p>5 Q Okay. And the task order does not set a</p> <p>6 quantity of advertising to buy, correct?</p> <p>7 MR. PRITCHETT: Objection. Form.</p> <p>8 THE WITNESS: It does provide estimated</p> <p>9 quantities of what's expected.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q Of the impressions; is that what you're</p> <p>12 referencing?</p> <p>13 A For -- for the top two major bullets of</p> <p>14 digital display and online video as well as for</p> <p>15 paid search, yes -- or, excuse me, paid social,</p> <p>16 yes. And then for the remaining items it lists</p> <p>17 out the approximate number of leads expected to be</p> <p>18 garnered for the investment.</p> <p>19 Q Okay. And those are --</p> <p>20 A Again, those are estimates.</p> <p>21 Q That's my next question.</p> <p>22 So you're looking at all of the</p>	<p style="text-align: right;">Page 49</p> <p>1 tell them how to go and purchase them.</p> <p>2 BY MS. GOODMAN:</p> <p>3 Q Okay. Does the Navy tell the contractor</p> <p>4 what vendors to purchase advertising from?</p> <p>5 MR. PRITCHETT: Objection. Form,</p> <p>6 foundation.</p> <p>7 THE WITNESS: In the form of an approved</p> <p>8 reco deck or an approved recommended plan, the</p> <p>9 Navy does. The Navy asks for a recommended plan</p> <p>10 and relies on the experience and expertise of the</p> <p>11 ad agency to provide a recommended plan, but they</p> <p>12 do not purchase it until the Navy has approved the</p> <p>13 plan.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q And under the contract and task orders</p> <p>16 for the contracts that we've been talking here --</p> <p>17 about here today between the Navy and VMLY&amp;R,</p> <p>18 VMLY&amp;R uses a subcontractor to purchase ads,</p> <p>19 correct?</p> <p>20 MR. PRITCHETT: Objection. Form,</p> <p>21 foundation.</p> <p>22 THE WITNESS: Based on my discussions</p>

<p style="text-align: right;">Page 50</p> <p>1 with the FLC contracting officer, the term</p> <p>2 "affiliate" was used to describe WaveMaker, the</p> <p>3 one who purchases the ads for Navy.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q I see. So rather than describing</p> <p>6 WaveMaker as a subcontractor, is it the Navy's</p> <p>7 position that the more appropriate way to describe</p> <p>8 them is affiliate?</p> <p>9 MR. PRITCHETT: Objection. Form.</p> <p>10 THE WITNESS: Again, based on my</p> <p>11 conversations with FLC, yes.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q And what is FLC?</p> <p>14 A The Fleet Logistics Center, the one who</p> <p>15 does contracts for the Navy.</p> <p>16 Q Okay. And there's no contract between</p> <p>17 Navy and WaveMaker, correct?</p> <p>18 MR. PRITCHETT: Objection. Form,</p> <p>19 foundation.</p> <p>20 THE WITNESS: The -- the marketing and</p> <p>21 -- the only marketing and advertising contract</p> <p>22 Navy has is with VMLY&amp;R.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q Do you know -- does the Navy know how</p> <p>2 WaveMaker makes purchases of ads for the Navy</p> <p>3 under the contracts we've been discussing?</p> <p>4 MR. PRITCHETT: Objection. Form.</p> <p>5 THE WITNESS: So the Navy tells them</p> <p>6 which ads or which -- approves a plan which lays</p> <p>7 out which vendors to buy from, but we do not tell</p> <p>8 them what methods to employ to purchase those, we</p> <p>9 rely on their expertise.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q And so does the Navy know how WaveMaker</p> <p>12 goes about actually purchasing the media for the</p> <p>13 Navy under the contracts we've been discussing?</p> <p>14 MR. PRITCHETT: Objection. Form.</p> <p>15 THE WITNESS: To an extent as what --</p> <p>16 what would be provided in the reco deck, but as</p> <p>17 far as the detailed execution of how those ads are</p> <p>18 placed, again, the Navy relies on the expertise of</p> <p>19 VMLY&amp;R to do that.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q Okay. So the best understand- -- the</p> <p>22 best representation of the Navy's understanding of</p>
<p style="text-align: right;">Page 51</p> <p>1 BY MS. GOODMAN:</p> <p>2 Q And thus there's not one between the</p> <p>3 Navy and WaveMaker, correct?</p> <p>4 MR. PRITCHETT: Same objections.</p> <p>5 THE WITNESS: The contract is between</p> <p>6 VMLY&amp;R and Navy and it's my understanding that</p> <p>7 WaveMaker is an affiliate of VMLY&amp;R and -- and</p> <p>8 does that purchasing on their -- on -- on behalf</p> <p>9 of them.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q On behalf of VMLY&amp;R?</p> <p>12 A Right.</p> <p>13 MR. PRITCHETT: Objection. Form.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q And there's no contract between Google</p> <p>16 and the Navy for purposes of marketing and</p> <p>17 advertising, correct?</p> <p>18 MR. PRITCHETT: Objection. Form,</p> <p>19 foundation.</p> <p>20 THE WITNESS: Correct, our contract is</p> <p>21 with VMLY&amp;R.</p> <p>22 BY MS. GOODMAN:</p>	<p style="text-align: right;">Page 53</p> <p>1 how ads are actually purchased is found in the</p> <p>2 tactical recommendation decks; am I understanding</p> <p>3 your testimony correctly?</p> <p>4 MR. PRITCHETT: Objection. Form.</p> <p>5 THE WITNESS: My testimony is that the</p> <p>6 Navy's understanding of which vendors to utilize</p> <p>7 would be laid out in that approved deck, but</p> <p>8 the -- the method employed to go out and procure</p> <p>9 the ad would -- would be something that VMLY&amp;R</p> <p>10 would -- would do themselves. We wouldn't tell</p> <p>11 them how to do it.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q And is something that is not known to</p> <p>14 the Navy, correct?</p> <p>15 MR. PRITCHETT: Objection. Form.</p> <p>16 THE WITNESS: To an extent. There would</p> <p>17 be an exception such as our programmatic buying</p> <p>18 with The Trade Desk.</p> <p>19 BY MS. GOODMAN:</p> <p>20 Q What is -- what do you mean by that?</p> <p>21 A So you're -- you're asking which methods</p> <p>22 are used to employ -- or which methods are</p>

<p style="text-align: right;">Page 86</p> <p>1 in -- or, excuse me, a final invoice adding --</p> <p>2 ending in Zulu. Like the delivery number will --</p> <p>3 will end in a Z or Zulu. And that will be</p> <p>4 indicative of this -- this is the final billing on</p> <p>5 that.</p> <p>6 Since sometimes rebates come after --</p> <p>7 after the fact, there can be a delay in when</p> <p>8 that's -- in when that's happening. So that's one</p> <p>9 of the reasons that this refund might be</p> <p>10 occurring, the -- the \$2,500 one.</p> <p>11 I'm sorry, what was your question again?</p> <p>12 It's -- it's -- it's a very complicated process,</p> <p>13 but...</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q So you need to go look at the most final</p> <p>16 invoice in order to know for sure how much money</p> <p>17 the Navy, in fact, paid to VMLY&amp;R under a</p> <p>18 particular task order?</p> <p>19 MR. PRITCHETT: Objection to form.</p> <p>20 THE WITNESS: The -- all the invoices</p> <p>21 would need to be looked at and -- in -- in order</p> <p>22 to tell what was -- what was paid in total.</p>	<p style="text-align: right;">Page 88</p> <p>1 agency.</p> <p>2 Q And if you look at her e-mail</p> <p>3 December 14th, 2022 that's in the middle of the</p> <p>4 page -- the first page, I want to direct your</p> <p>5 attention to the third open bullet down beginning</p> <p>6 "How are recruiting results actually tracked."</p> <p>7 Do you see that?</p> <p>8 A Uh-huh.</p> <p>9 Q Okay. And then there's a sub-bullet,</p> <p>10 dark bullet, beginning "TNP Analytics."</p> <p>11 Do you see that?</p> <p>12 A I do not.</p> <p>13 Q The --</p> <p>14 A Oh, yes, yes. "TNP Analytics provides</p> <p>15 EOM"?</p> <p>16 Q Yes.</p> <p>17 A Yeah.</p> <p>18 Q What is TNP Analytics?</p> <p>19 A Sure. TNP, and I think I had mentioned</p> <p>20 this in previous testimony, TNP is an acronym</p> <p>21 standing for The Navy Partnership, and that</p> <p>22 originates from when the agency was first brought</p>
<p style="text-align: right;">Page 87</p> <p>1 BY MS. GOODMAN:</p> <p>2 Q And would you also need to look at any</p> <p>3 refunds issued to the Navy?</p> <p>4 A Yes. If there were any refunds that --</p> <p>5 that -- that occurred such as these -- and -- and,</p> <p>6 again, you're -- you're providing me a -- an</p> <p>7 e-mail with an attachment, but I'm not sure if</p> <p>8 that was also on an invoice or not, so that's why</p> <p>9 I'd have to pull up all of those. But -- but yes,</p> <p>10 that would also have to be looked at.</p> <p>11 Q I'm handing you what's been -- a</p> <p>12 document that we looked at in your first</p> <p>13 deposition which we marked in your deposition as</p> <p>14 Exhibit 60, so I'm going to mark it again as 60,</p> <p>15 NAVY-ADS-28530 to 31. And this is an e-mail</p> <p>16 thread that you're on along with Rae Ann Fisch</p> <p>17 from VMLY&amp;R.</p> <p>18 Who is Ms. Fisch?</p> <p>19 A Ms. Fisch is one of the client</p> <p>20 engagement folks, group -- well, as her title</p> <p>21 states here, "Group Director, Client Engagement."</p> <p>22 She's one of our main points of contact at the</p>	<p style="text-align: right;">Page 89</p> <p>1 on board in 2016. There were multiple affiliates</p> <p>2 that were -- that were utilized during that first</p> <p>3 contract, approximately five or six I believe.</p> <p>4 And rather than -- since some of them had</p> <p>5 differing e-mails and things like that, they</p> <p>6 referred to themselves as The Navy Partnership or</p> <p>7 TNP and that's just kind of carried forward.</p> <p>8 Q And so The Navy Partnership refers only</p> <p>9 to people working at the ad agency, VMLY&amp;R, or one</p> <p>10 of its affiliates; is that accurate?</p> <p>11 MR. PRITCHETT: Objection. Form.</p> <p>12 THE WITNESS: Yes, that's accurate.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q Okay. And then Ms. Fisch writes in the</p> <p>15 middle of this bullet, "Yet due to the nature of</p> <p>16 digital marketing channels, optimizations and</p> <p>17 other advertising strategy adjustments are made in</p> <p>18 realtime and are optimized based on key KPIs such</p> <p>19 as Cost per Lead, RFI form completions and Q&amp;I</p> <p>20 lead trends."</p> <p>21 A I'm sorry, where are you reading that</p> <p>22 from?</p>

<p style="text-align: right;">Page 90</p> <p>1 Q In the same dark bullet that began "TNP</p> <p>2 Analytics." It's --</p> <p>3 A Oh, okay. Gotcha.</p> <p>4 Q Do you see where I am now?</p> <p>5 A Yes.</p> <p>6 Q Okay. And is it the TNP or members of</p> <p>7 TNP who conduct the optimizations and other</p> <p>8 strategy adjustments in realtime?</p> <p>9 MR. PRITCHETT: Objection. Form.</p> <p>10 THE WITNESS: So I can't speak with</p> <p>11 certainty as to the specific instance that</p> <p>12 Ms. Fisch was referring to when she sent this</p> <p>13 e-mail back in December 14. But my understanding</p> <p>14 would be that when she talks about "due to the</p> <p>15 nature of digital marketing channels," it's</p> <p>16 referring to the nature of how the longer a</p> <p>17 campaign runs the more efficient it becomes as</p> <p>18 machine learning can occur to find out what copies</p> <p>19 is doing well per whatever the goal is, whether it</p> <p>20 be cost per click or whatever, and that those</p> <p>21 optimizations can run the longer that campaign</p> <p>22 runs.</p>	<p style="text-align: right;">Page 92</p> <p>1 channels"?</p> <p>2 MR. PRITCHETT: Objection. Form.</p> <p>3 THE WITNESS: Just as I was describing.</p> <p>4 Perhaps I didn't say it well, but due to -- for --</p> <p>5 for instance, if you put a broadcast T.V.</p> <p>6 commercial out, like you can't change the content</p> <p>7 of that, it's out there. You'd have to take it</p> <p>8 down and reissue. If you put a billboard up,</p> <p>9 paper billboard up, like a physical billboard up,</p> <p>10 you couldn't say, well, this one is working, the</p> <p>11 other one is not, let's take it down. I mean,</p> <p>12 you -- you could, but it would be a lengthy thing.</p> <p>13 So, again, my understanding of what</p> <p>14 she's describing here is due to the nature that,</p> <p>15 you know, digital marketing allows for you to have</p> <p>16 multiple copies, multiple audiences that you're</p> <p>17 targeting with multiple images, and have machine</p> <p>18 learning run in the background that can then find</p> <p>19 which one's working and A/B test and then realtime</p> <p>20 optimize the best copy that's working or the best</p> <p>21 images that are working or the best audiences that</p> <p>22 are getting you the clicks or whatever the metric</p>
<p style="text-align: right;">Page 91</p> <p>1 BY MS. GOODMAN:</p> <p>2 Q And does anybody from the Navy sign off</p> <p>3 on these realtime optimizations before they're</p> <p>4 performed?</p> <p>5 MR. PRITCHETT: Objection. Form.</p> <p>6 THE WITNESS: So, no, in -- in</p> <p>7 referencing a realtime optimization, I'm -- I'm</p> <p>8 referencing the machine learning optimizations</p> <p>9 that happen as -- as an ad is placed in multiple</p> <p>10 places. So it's a -- it's a -- from my</p> <p>11 understanding, it's an automated process to where</p> <p>12 if you allow the campaign to run a longer period</p> <p>13 of time, the copy that is working, the -- the</p> <p>14 images that are working providing the best ROI for</p> <p>15 that are then utilized. So it's like a -- a bunch</p> <p>16 of A/B testing happening at the same time. That's</p> <p>17 my understanding of how that process works --</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q And what --</p> <p>20 A -- without human interference.</p> <p>21 Q What do you understand her to mean when</p> <p>22 she says "due to the nature of digital marketing</p>	<p style="text-align: right;">Page 93</p> <p>1 is that you're going after, that that's what she's</p> <p>2 referencing here saying the key to digital</p> <p>3 marketing as opposed to out of home or, you know,</p> <p>4 broadcast, et cetera.</p> <p>5 BY MS. GOODMAN:</p> <p>6 Q And is that a feature of digital</p> <p>7 marketing across multiple kinds of digital</p> <p>8 marketing such as display, video, social?</p> <p>9 MR. PRITCHETT: Objection. Form,</p> <p>10 foundation.</p> <p>11 THE WITNESS: Yeah, it's my</p> <p>12 understanding that that type of technology exists</p> <p>13 in all of those.</p> <p>14 BY MS. GOODMAN:</p> <p>15 Q Okay. Okay. You can set that to the</p> <p>16 side.</p> <p>17 Does the Navy have an amount of money in</p> <p>18 mind that it believes would compensate Navy for</p> <p>19 any alleged harm suffered by Google's</p> <p>20 anticompetitive -- alleged anticompetitive</p> <p>21 conduct?</p> <p>22 MR. PRITCHETT: Objection. Form,</p>

<p style="text-align: right;">Page 106</p> <p>1 through Google's Ad Exchange?</p> <p>2 A No, we do not.</p> <p>3 MR. PRITCHETT: Okay. No further</p> <p>4 questions.</p> <p>5 MS. GOODMAN: Okay.</p> <p>6 VIDEO TECHNICIAN: The time is</p> <p>7 12:08 p.m. We're off the record.</p> <p>8 (Whereupon, at 12:08 p.m., the</p> <p>9 deposition of ALLEN OWENS, JR.</p> <p>10 was concluded.)</p> <p>11 * * * * *</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 108</p> <p>1 A C K N O W L E D G E M E N T</p> <p>2 O F D E P O N E N T</p> <p>3</p> <p>4 I, ALLEN OWENS, JR., do hereby acknowledge</p> <p>5 I have read and examined the foregoing pages of</p> <p>6 testimony, and the same is a true, correct and</p> <p>7 complete transcription of the testimony given by</p> <p>8 me, and any changes or corrections, if any, appear</p> <p>9 in the attached errata sheet signed by me.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 _____</p> <p>21 Date ALLEN OWENS, JR.</p> <p>22 Job No. CS6118347</p>
<p style="text-align: right;">Page 107</p> <p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, SHARI R. BROUSSARD, the officer before</p> <p>3 whom the foregoing deposition was taken, do hereby</p> <p>4 certify that the witness whose testimony appears</p> <p>5 in the foregoing deposition was duly sworn by me;</p> <p>6 that the testimony of said witness was taken by me</p> <p>7 in stenotype and thereafter reduced to typewriting</p> <p>8 under my direction; that said deposition is a true</p> <p>9 record of the testimony given by said witness;</p> <p>10 that I am neither counsel for, related to, nor</p> <p>11 employed by any of the parties to the action in</p> <p>12 which this deposition was taken; and, further,</p> <p>13 that I am not a relative or employee of any</p> <p>14 counsel or attorney employed by the parties</p> <p>15 hereto, nor financially or otherwise interested in</p> <p>16 the outcome of this action.</p> <p>17</p> <p>18 </p> <p>19 SHARI R. BROUSSARD</p> <p>20 Notary Public in and for the</p> <p>21 District of Columbia</p> <p>22 My commission expires:</p> <p>August 14, 2025</p>	<p style="text-align: right;">Page 109</p> <p>1 Katherine Clemons Esq.</p> <p>2 katherine.clemons@usdoj.gov</p> <p>3 October 2, 2023</p> <p>4 RE: United States, Et Al v. Google, LLC</p> <p>5 9/28/2023, Allen Owens, Jr., Navy 30(B)(6) (#6118347)</p> <p>6 The above-referenced transcript is available for</p> <p>7 review.</p> <p>8 Within the applicable timeframe, the witness should</p> <p>9 read the testimony to verify its accuracy. If there are</p> <p>10 any changes, the witness should note those with the</p> <p>11 reason, on the attached Errata Sheet.</p> <p>12 The witness should sign the Acknowledgment of</p> <p>13 Deponent and Errata and return to the deposing attorney.</p> <p>14 Copies should be sent to all counsel, and to Veritext at</p> <p>15 erratas-cs@veritext.com</p> <p>16</p> <p>17 Return completed errata within 30 days from</p> <p>18 receipt of testimony.</p> <p>19 If the witness fails to do so within the time</p> <p>20 allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22 Yours,</p> <p>23 Veritext Legal Solutions</p> <p>24</p> <p>25</p>



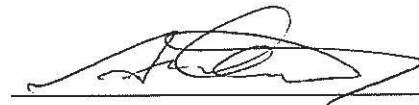
A C K N O W L E D G E M E N T  
O F D E P O N E N T

I, ALLEN OWENS, JR., do hereby acknowledge

I have read and examined the foregoing pages of  
testimony, and the same is a true, correct and  
complete transcription of the testimony given by  
me, and any changes or corrections, if any, appear  
in the attached errata sheet signed by me.

23 OCT 2023

Date



ALLEN OWENS, JR.

Job No. CS6118347



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1 United States, Et Al v. Google, LLC

2 Allen Owens, Jr., Navy 30(B)(6) (#6118347)

3 E R R A T A S H E E T

4 PAGE 8 LINE 3 CHANGE Change spelling of name from  
 5 Shuntay to Shantay Clarke.

6 REASON Had incorrect spelling.

7 PAGE 10 LINE 10,14,16 CHANGE Change spelling of name from  
 8 Shuntay to Shantay

9 REASON Had incorrect spelling.

10 PAGE 11 LINE 8,10,18 CHANGE Change spelling of name from  
 11 Shuntay to Shantay.

12 REASON Had incorrect spelling.

13 PAGE 43 LINE 8 CHANGE issues it to us -- to the Marketing  
 14 Department within the Navy Recruiting Command

15 REASON More complete answer.

16 PAGE 45 LINE 4 CHANGE change "they're" to "that are"

17  
 18 REASON potential typo or misheard line; this is more accurate

19 PAGE 90 LINE 18 CHANGE "copies" to "copy"

20  
 21 REASON typo or misheard; 'copy' refers to the words used in an ad

22  
 23 

24 Allen Owens, Jr. , Navy 30(B)(6)

23 OCT 2023

25 Date

Page 110

United States, Et Al v. Google, LLC

Allen Owens, Jr., Navy 30(B)(6) (#6118347)

E R R A T A S H E E T

PAGE 91 LINE 16 CHANGE AV to A-B

REASON This was misheard; this references A-B testing.

PAGE 92 LINE 19 CHANGE AV to A-B

REASON This was misheard; this references A-B testing.

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

REASON \_\_\_\_\_



Allen Owens, Jr. , Navy 30(B)(6)

23 OCT 2023

Date